

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (JKF)
) Jointly Administered
Debtors.)

**AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON DECEMBER 15, 2003 AT 1:00 P.M. IN PITTSBURGH,
PENNSYLVANIA BEFORE THE HONORABLE JUDITH K. FITZGERALD**

CONTINUED MATTERS

1. Motion of Caterpillar Financial Services Corporation to Compel Payment of Administrative Expenses and for Relief from the Automatic Stay or in the Alternative for Adequate Protection (Docket No. 3009)

Related Documents:

- a. [Proposed] Order regarding Docket No. 3009 (Docket No. 3009)

Response Deadline: Extended through December 22, 2003 at 4:00 p.m. for the Debtors

Responses Received: None as of the date of this Notice of Agenda.

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Status: The parties are continuing to work on a resolution to this matter and respectfully request that the matter will be continued to the omnibus hearing on January 26, 2004 at 12:00 p.m.

UNCONTESTED MATTERS

2. Motion for Reconsideration of Order Disallowing Claim No. 1658 Filed by Valeron Strength Films Against W. R. Grace & Co. (Docket No. 4610)

Related Documents:

- a. [Proposed] Order (1) Vacating Court's Prior Order Granting Debtors' Second Omnibus Objection to Claims with Respect to Claim No. 1658 Filed by Valeron Strength Films and (2) Reinstating the VSF Claim (Docket No. 4610)
- b. Certification of Counsel Re: Stipulation and Agreed Order Resolving the Motion for Reconsideration of Order Disallowing Claim No. 1658 Filed By Valeron Strength Films (Docket No. 4677)

Response Deadline: November 28, 2003 at 4:00 p.m.

Status: A Certification of Counsel was filed with an attached proposed stipulation and order resolving the motion.

3. Debtors' Response and Objection to Libby Claimants' Second Request for Production of Documents and Motion for Protective Order (Adv. Pro. No. 01-771, Docket No. 176)

Related Documents:

- a. [Proposed] Protective Order Finding that Debtors Have No Obligation to Produce Any Additional Documents Pursuant to Libby Claimants' Second Request for Production of Documents (Adv. Pro. No. 01-771, Docket No. 176)

Response Deadline: December 1, 2003 at 4:00 p.m.

Status: This matter will be withdrawn, as the Libby Claimants will be withdrawing their Second Request for Production of Documents.

4. Ninth Quarterly Interim Applications of Counsel to the Debtors and Statutory Committees for Compensation for Services Rendered and Reimbursement of Expenses for the Period April 1, 2003 Through June 30, 2003.

Responses Received: None.

Related Documents:

- a. Certification of Counsel Regarding Ninth Quarter Project Category Summary for the Ninth Interim Fee Period and Certain Prior Amounts (Docket No. 4782)
- b. Certification of Counsel Regarding Order Approving Quarterly Fee Applications for the Ninth Period and Certain Prior Amounts (Docket No. 4780)

Status: This matter will be going forward.

CONTESTED MATTERS

- 5. Motion of Yessenia Rodriguez and Carlos Nieves Relief From the Stay Provided By 11 U.S.C. §362 of the Bankruptcy Code (Docket No. 3707)

Related Documents:

- a. [Proposed] Order (Docket No. 3707)

Response Deadline: May 11, 2003 at 4:00 p.m. (*Extended until July 11, 2003 at 4:00 p.m.*)

Responses Received:

- a. Debtor's Objection to Yessenia Rodriguez's and Carlos Nieves' Motion to Lift Automatic Stay (Docket No. 4046)

Status: This matter will be going forward.

- 6. Motion of Oldcastle APG Northeast, Inc. D/B/A Foster-Southeastern for Relief from Stay Under Section 362 of the Bankruptcy Code (Docket No. 4458)

Related Documents:

- a. [Proposed] Order Granting Motion of Oldcastle APG Northeast, Inc. D/B/A Foster-Southeastern for Relief from Stay Under Section 362 of the Bankruptcy Code (Docket No. 4458)

Response Deadline: October 10, 2003 at 4:00 p.m.

Responses Received:

- a. Debtors' Objection to Oldcastle's APG Northeast, Inc. D/B/A Foster-South Eastern Motion for Relief from Stay

Under Section 362 of the Bankruptcy Code (Docket No. 4570)

Status: The parties have agreed to continue this matter until January 26, 2003 at 12:00 p.m.

7. Motion to Compel *[filed by: Wesconn Co., Inc. and FUS, Inc.]* (Docket No. 4577)

Related Documents:

- a. [Proposed] Order (Docket No. 4577)

Response Deadline: October 31, 2003 at 4:00 p.m.

Responses Received:

- a. Debtors' Objection to Wesconn Co., Inc.'s and FUS, Inc.'s Motion to Compel (Docket No. 4645)

Status: The parties have agreed to continue this matter until January 26, 2003 at 12:00 p.m.

8. Royal Indemnity Company's Motion for Leave to File a Late Proof of Claim (Docket No. 4667)

Related Documents:

- a. [Proposed] Order Granting Royal Indemnity Company's Motion for Leave to File a Late Proof of Claim (Docket No. 4667)

Response Deadline: November 26, 2003 at 4:00 p.m.

Responses Received:

- a. Debtors' Objection to Royal Indemnity Company's Motion for Leave to File a Late Proof of Claim (Docket No. 4749)
- b. Objection of the Official Committee of Asbestos Property Damage Claimants to Royal Indemnity Company's Motion for Leave to File a Late Proof of Claim (Docket No. 4757)
- c. Objection of Carol Gerard, et al. to Royal Indemnity Company's Motion for Leave to File a Late Proof of Claim (Docket No. 4758)
- d. Joinder of the Official Committee of Asbestos Claimants in the Debtors' Objection to Royal Indemnity Company's

Motion for Leave to File Late Proof of Claim (Docket No. 4760)

- e. **Royal Indemnity Company's Reply to Objections (D.I. 4749, 4757, 4758, 4760) and in Further Support of Royal's Motion for Leave to File a Late Proof of Claim (D.I. 4667) (Docket No. 4788)**

Status: This matter will be going forward.

- 9. Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 153)

Related Documents:

- a. [Proposed] Order Expanding the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 153)
- b. Certification of Counsel Regarding Scheduling Order Related to Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 166)
- c. [Signed] Amended Scheduling Order Related to Debtors' Motion to Expand Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 175)

Response Deadline: August 8, 2003 at 4:00 p.m. *(extended until September 9, 2003 for the litigation plaintiffs)*

Responses Received:

- a. Opposition of Carol Gerard, et al. to Debtors; Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 156)
- b. Debtors' Reply in Support of its Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 160)
 - (i) Motion for Leave to File Debtors' Reply in Support of its Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 160)

- c. Further Opposition of Carol Gerard, et al. to Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 162)
 - (i) Motion for Leave to File Further Opposition of Carol Gerard, et al. to Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 161)
- d. Debtors' Reply in Further Support of Their Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 174)
- e. Debtors' Response and Objection to Libby Claimants' Second Request for Production of Documents and Motion for Protective Order (Adv. Pro. No. 01-771, Docket No. 176)
- f. Response of Carol Gerard, et al., to Debtors' Reply in Support of Their Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 177)
- g. **Debtors' Reply to the Most Recent Response of the Libby Claimants with Respect to Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 178)**
 - i. **Motion for Leave to File Debtors' Reply to the Most Recent Response of the Libby Claimants with Respect to Debtors' Motion to Expand the Preliminary Injunction to Include Actions Against Montana Vermiculite Company (Adv. Pro. No. 01-771, Docket No. 178)**

Status: This matter will be going forward.

10. Ninth Quarterly Interim Applications of Counsel to the Debtors and Statutory Committees for Compensation for Services Rendered and Reimbursement of Expenses for the Period April 1, 2003 Through June 30, 2003.

Related Documents:

- a. Certification of Counsel Regarding Ninth Quarter Project Category Summary for the Ninth Interim Fee Period and Certain Prior Amounts (Docket No. 4782)
- b. Certification of Counsel Regarding Order Approving Quarterly Fee Applications for the Ninth Period and Certain Prior Amounts (Docket No. 4780)

Responses Received: None as of the date of this Notice of Agenda. The Debtors anticipate that any professionals who have not resolved their issues with the Fee Auditor, will file replies to the Fee Auditor's recommendations in the Final Reports within twenty days after the date of the respective Final Report.

Status: This matter will be going forward.

OMNIBUS CLAIM OBJECTIONS

11. Debtors' First Omnibus Objection to Claims (Substantive) (Docket No. 4088)

Related Documents:

- a. Declaration of David B. Siegel in Support of Debtors' First Omnibus Objection to Claims (Substantive) (Docket No. 4105)

Response Deadline: August 8, 2003 at 4:00 p.m.

Responses Received:

- a. Letter Response of Pipeline Services Inc. (Docket No. TBD)

Status: The Court has previously entered an order resolving the claim objections included in the Debtors' First Omnibus Objection to Claims, with the exception of the claim of Pipeline Services Inc. This claim will be resolved or continued.

12. Debtors' Second Omnibus Objection to Claims (Non-Substantive) (Docket No. 4089)

Related Documents:

- a. Declaration of David B. Siegel in Support of Debtors' First Omnibus Objection To Claims (Non-Substantive) (Docket No. 4106)

Response Deadline: August 8, 2003 at 4:00 p.m.

Responses Received: Unresolved Responses to this matter are listed on the attached Exhibit A.

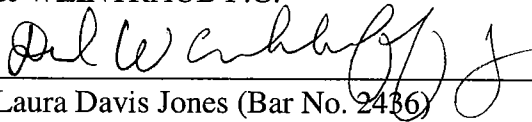
Status: The status of each claim is indicated in the charts attached as Exhibit A.

Dated: December 11, 2003

KIRKLAND & ELLIS LLP
James H.M. Sprayregen, P.C.
Janet S. Baer
James W. Kapp III
Christian J. Lane
200 East Randolph Drive
Chicago, Illinois 60601
(312) 861-2000

and

PACHULSKI, STANG, ZIEHL, YOUNG, JONES
& WEINTRAUB P.C.



Laura Davis Jones (Bar No. 2486)
Scotta E. McFarland (Bar No. 4184)
David W. Carickhoff, Jr. (Bar No. 3715)
919 North Market Street, 16th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400

Co-counsel for Debtors and Debtors in Possession